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BUYERQUEST, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12 TRADESHIFT, INC., a Delaware corporation,
13 Plaintiff,
14 v.
15 BUYERQUEST, INC., an Ohio corporation,
16 Defendant.

Case No. 3:20-cv-1294-RS

**STIPULATION AND ORDER TO
MODIFY CASE SCHEDULE**

STIPULATION TO MODIFY CASE SCHEDULE

Tradeshift, Inc. (“Tradeshift”) and BuyerQuest, Inc. (“BuyerQuest”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Court issued an Initial Case Management Order on June 2, 2020 (ECF 36) identifying certain deadlines for fact discovery, expert reports, expert discovery, and dispositive motions;

WHEREAS, pursuant to the Stipulation of the parties, on January 21, 2021 (ECF 52), the Court entered an Order modifying certain discovery deadlines set by the Initial Case Management Order;

WHEREAS, pursuant to further Stipulation of the parties, on February 19, 2021 (ECF 60), the Court entered an Order further modifying certain discovery deadlines;

WHEREAS, the parties have engaged and continue to engage in good faith conferrals regarding discovery and preparation of the case for trial;

WHEREAS, notwithstanding good faith efforts to schedule depositions, the parties agree they need additional time to complete depositions given certain scheduling conflicts and, as a result, have stipulated to a proposed revised schedule for completing discovery,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel of record and subject to the approval of the Court, that the dates in the February 19, 2021 Stipulation and Order to Modify Discovery Deadlines shall be modified as follows:

Event	Current Deadline	
Last day to take non-expert deposition.	April 30, 2021	May 15, 2021
Opening Expert Reports	May 14, 2021	June 4, 2021
Rebuttal Expert Reports	June 11, 2021	July 2, 2021
Expert Discovery Cutoff	July 9, 2021	July 23, 2021
Dispositive Motion Hearing	September 9	No Change
Pretrial Conference	October 20, 2021	No Change
Trial	November 1, 2021	No Change

1 Dated: May 6, 2021

By: /s/ Amy K Van Zant
AMY K. VAN ZANT
Attorneys for Plaintiff
TRADESHIFT, INC.

4 Dated: May 6, 2021

By: /s/ Anthony Phillips
ANTHONY PHILLIPS
Attorneys for Defendant
BUYERQUEST, INC.

8 **ATTESTATION**

9 I attest that, under Civil Local Rule (5-1)(i)(3), I have obtained concurrence in the filing of
10 this document from all Signatories.

11 /s/ Jason K. Yu
12 Jason K. Yu

14 **IT IS SO ORDERED**

15 Dated: May 6, 2021

16 

17 RICHARD SEEBORG
18 Chief United States District
19 Judge